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Avoidance Action Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a  
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)  
(Jointly Administered)

Debtors.

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**NOTICE OF AMENDMENT AND RESTATEMENT OF MOTORS  
LIQUIDATION COMPANY AVOIDANCE ACTION TRUST AGREEMENT**

The Motors Liquidation Company Avoidance Action Trust, by its undersigned counsel, hereby files the Second Amended and Restated Avoidance Action Trust Agreement dated as of August 25, 2016 (the “**Second Amended and Restated Agreement**”), a copy of which is annexed hereto as Exhibit A.

The Second Amended and Restated Agreement amends and restates in its entirety the Amended and Restated Avoidance Action Trust Agreement dated March 30, 2011, as authorized by the *Memorandum Opinion and Order Approving Motion for an Order Approving Stipulation of Settlement and Other Relief* issued by this Court on August 24, 2016 [Bankr. Dkt. No. 13744].

Dated: New York, New York  
August 29, 2016

**BINDER & SCHWARTZ LLP**

/s/ Eric B. Fisher

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